COWLITZ COUNTY

DEPARTMENT OF BUILDING & PLANNING
207 FOURTH AVE. NORTH, KELSO, WA 98626

Phone (360) 577-3052 Fax (360) 414-5550 www.co.cowlitz.wa.us/buildplan

Review Number 10-10-1184

Mitigated Determination of Non-Significance

Description of Proposal:

Millennium Bulk Logistics, Inc. (Millennium) has filed applications for two shoreline substantial development permits within the Columbia River shoreline as part of a larger project to assume operations of the multi-modal bulk materials handling facility, to be known as the Millennium Bulk Logistics Longview Terminal Facility (the project). The focus of the project is to improve and enhance the existing infrastructure at the former Reynolds site in order to increase the safe and efficient bulk handling of alumina, coal, and cementitious materials for import and export. Each of the two permit applications are discussed below:

1) Dock Repair and Maintenance. The proposed actions include both in-water and over-water work. In-water maintenance activities include repairing or replacing damaged creosote-treated timber piles supporting the existing access trestle, dock, and Reynolds Ship Loader foundation with steel piles. Existing creosote-treated timber fender piles on two existing dolphins will be replaced with steel fender piles. An existing dolphin, composed of creosote-treated timber piles and located to the west of the dock, will also be removed and replaced with a dolphin composed of steel piles. The replacement dolphin will be reinstalled approximately 150 feet to the west without an increase in the over-water coverage to improve safety of docking operations. The existing Chinook Ventures Incorporated (CVI) ship loader, associated conveyor system, and supporting piles will be removed. Over-water maintenance activities would include replacing the existing damaged walkway connected to the dolphin on the west side of the dock with a grated steel walkway. The existing Reynolds alumina transfer conveyor will be restored to its original condition. The existing Reynolds loader platform and decking will be removed and replaced with a latticework frame structure. This replacement system will remove damaged materials, facilitate pile removal and replacement, and support continued operation of the Reynolds loader. Existing fire control systems on the dock will be repaired, consistent with the original facility design. A total of 96 new piles will be installed in approximately four to eight weeks, which will be performed consistent with the appropriate period allowed by fish and wildlife resource agencies for work in the water.

2) Infrastructure Maintenance and Upgrades. The proposed actions for new coal handling operations will include receipt of coal by rail and export of coal by marine vessel. Cementitious materials handling will include receipt of cementitious materials by vessel, with transfer to rail for regional distribution (90 percent) and to trucks for local distribution (10 percent). Existing alumina handling and shipping will continue. A new conveyor system will be installed on the existing dock for coal export via marine vessel and will include a series of belt conveyors and transfer towers for moving coal from the stockpile to the dock, and a new on-dock conveyor to move coal to a new purpose-built ship loader. Cementitious materials handling will include new offloading systems for import of cementitious materials at the dock, new or upgraded conveyor and storage facilities, and new or upgraded facilities for truck and rail loading for distribution to local and regional markets. Non shoreline upland activities include: On-site rail infrastructure and offloading equipment with an extension of the existing rail system, new conveyor systems, and access and maintenance roads. A 525,000 square foot stockpile area will be created to store approximately 300,000 metric tons of coal, which will include a water collection and storage pond to collect runoff, stacker feed conveyors, and a coal reclaim system. Other upland facility improvements will include renovations to existing buildings on the site and connection of the property to municipal potable water supplies for on-site drinking water uses. Industrial water and fire control water supplies are to continue being supplied from on-site production wells.

Proponent: Millennium Bulk Logistics Lyle Hobbs
170 South Main, Suite 700
Salt lake City, UT 84101

Contact Person: Lyle Hobbs
Contact Phone: 801-712-7571

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Location of Proposal 4029 Industrial Way, Longview, Washington 98632, Cowlitz County in portions of Sections 30 and 31 of Township 8 North, Range 2 West and Sections 25, 26, 35, and 36 of Township 8 North, Range 3 West of the Willamette Meridian (W.M.). Parcel numbers 61950, 61953, 6195302, WI3110006, 10213, 10214, 10215, and WDNR Aquatic Lands Lease #20-B09222.

Lead Agency: COWLITZ COUNTY DEPARTMENT OF BUILDING AND PLANNING

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21c.030 (2)(c), provided the measures listed below are used to mitigate potential adverse impacts. This decision was made after review of a completed environmental checklist and other information on file with this lead agency. This information is available to the public on request.

This Mitigated Determination of Non-Significance (MDNS) is issued under WAC 197-11-340(2); the lead agency will not act on the proposal for 14 days from the date below. Comments must be submitted by October 22, 2010.

Identified Environmental Impacts & Mitigation Measures: This MDNS is hereby conditioned upon mitigation measures, as authorized under WAC 197-11-660, ACC 18.04.090, and 18.06. In addition to compliance with all existing laws and regulations, the following mitigation measures are determined to be reasonable and capable of being accomplished and, having also considered the applicable local, state, and federal permit laws and regulations, the following mitigation measures are sufficient to mitigate the identified potential significant adverse impacts arising from the Project. These conditions are based, in part on the Environmental Policies found in the Cowlitz County Code at 19.11.080. These mitigation measures shall be conditions of approval of any subsequent issued County permit.

The following conditions shall apply based on the project specific analysis:

I. General Agency Conditions

1. The applicant will comply with the conditions of Hydraulic Project Approvals (HPAs) issued for the Project by the Washington State Department of Fish and Wildlife.

2. The applicant will comply with the conditions of Section 10 and Section 404 permits issued for the Project by the US Army Corps of Engineers.

3. The applicant will comply with the conditions of 401 Water Quality Certifications and National Pollutant Discharge Elimination System permits issued for the Project by the Washington State Department of Ecology.

4. The applicant will comply with the conditions of Shoreline Substantial Development, building, grading, stormwater, demolition or other applicable permits issued for the Project by Cowlitz County.

5. The applicant will comply with the conditions of Rights of Entry, Aquatic Use Authorizations or Leases issued for the Project by the Washington State Department of Natural Resources.

6. The applicant will comply with the conditions of air quality permits issued for the Project by the Southwest Air Pollution Authority.

7. New infrastructure work within the CDID-maintained levee system will be reviewed and approved by CDID prior to and post construction.

8. Millennium proposes to operate a bulk handling facility focused on the handling of alumina, cementitious materials, and coal. Millennium may also continue the rental of property to other business operations. Millennium acknowledges that if additional business operations are proposed by Millennium (such as the handling and transport of materials other than alumina, coal, or cementitious materials), then the handling and transport of these additional materials would be addressed in a separate SEPA review.

II. SEPA Conditions by Elements of Environment

9. Earth

a. The applicant shall obtain coverage under and comply with the provisions of the Washington State Department of Ecology's (WDOE) Construction Stormwater General Permit (CSGP) for the management of erosion and sediment control during the construction phase of the Project as required by applicable laws.

b. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared for the Project and adaptively managed to address any identified on-site erosion control and sedimentation issues or changes in Project design or construction. A copy of the SWPPP shall be submitted to the County prior to commencement of construction. Plan modification and monitoring shall be conducted by a Certified Erosion and Sediment Control Lead (CESCL) in accordance with the requirements of the CSGP.

c. Invasive work in upland areas of the site subject to ongoing Model Toxics Control Act (MTCA) investigation and cleanup actions overseen by Ecology shall be coordinated with Ecology to ensure that the proposed actions do not interfere with ongoing cleanup activities, and to ensure that all generated materials are appropriately managed.

d. Erosion control Project Best Management Practices (BMPs) will be implemented to avoid or minimize adverse impacts. The BMPs to be implemented for the Project are provided in the SEPA Checklist Project Description.

e. A Temporary Erosion and Sediment Control (TESC) plan will be completed and approved by the County prior to and implemented during construction phases that involve clearing, grading, or alterations that could result in erosion.

10. Air

a. The applicant shall develop, implement, and maintain a comprehensive fugitive dust control plan to mitigate impacts during construction. The plan shall be developed consistent with guidance provided in the Washington Association of General Contractors publication entitled "Guide to Handling Fugitive Dust from Construction Project". The plan shall address material storage and handling, material handling and transfer, clearing, leveling, and development construction, material processing and transfer, earth moving and excavation, road ways and yard areas, spillage on paved roads, loading, hauling, and dumping materials, and exposed surfaces. The plan shall be submitted to the County and to the Southwest Clean Air Authority (SWCAA) and approved prior to commencement of Construction. The plan shall include the installation and operation of dust suppression systems at open stockpiles and all conveyor discharge and transfer points, and include BMPs for roadway maintenance to prevent the release of potential fugitive dust onto the site or the Columbia River.

b. Coal and cementitious material handling infrastructure are to be purpose-built with integrated dust control systems. These systems will be designed, constructed and operated in accordance with SWCAA requirements.

c. The ship loader shall include conveyor covers for dust and stormwater control, as well as dribble pans and wash water collection systems.

d. The applicant shall develop a baseline greenhouse gas (GHG) emissions estimate for the Millennium bulk terminal operations. The emissions estimate shall include Scope 1 and Scope 2 emissions from activities under the organizational and operational control of Millennium Bulk Logistics. The baseline report shall quantify baseline terminal emissions on a "per ton" basis for products handled at the facility, and on an estimated "annual total" basis consistent with anticipated operating levels. The report shall identify measures that have been taken to minimize the GHG footprint of the terminal, and shall evaluate other potentially feasible measures that could be used to further minimize GHG emissions associated with bulk product handling.

e. Applicant shall ensure that terminal customers or affiliated companies shipping coal products by rail to the facility have procedures in place to ensure that rail cars loaded with Coal shall not emit more than an Integrated Dust Value (IDV.2) of 300 units. An IDV.2 unit is a measure of the volume of coal dust coming off of the coal train over its entire length. The procedures shall ensure that profiling and any products or appurtenances shall be applied or installed in accord with manufacturer's recommendations, where appropriate. Any product, device or appurtenance utilized by Shipper or Shipper's mine agents to control the release of coal dust shall not adversely impact railroad employees, property, locomotives, or owned rail cars.

11. Water

a. In-water work (not including mobilization) will occur during the approved regulatory work window, or an approved extension of the work window, for the Columbia River. The applicable work window for listed/protected species is anticipated to be between October and February of the year of construction, subject to modification during completion of Project permitting and Endangered Species Act (ESA) review.

b. The Project will adhere to both Department of Ecology and County requirements for stormwater management. On-site stormwater will be managed as required by Ecology's Stormwater Management Manual for Western Washington (revised 2005) and County stormwater standards. These systems will be designed and constructed in accordance with Department of Ecology and National Pollutant Discharge Elimination System (NPDES) requirements.

c. Construction of the proposed Project will comply with water quality requirements imposed by Ecology (Chapter 173-201A WAC), which specify a mixing zone beyond which water quality standards cannot be exceeded. Compliance with Ecology's standards is intended to ensure that fish and aquatic life are protected to the extent feasible and practical.

d. When practical, in-water work near the shoreline will occur when river levels are low enough to prevent incidental contact of material with water during restoration and construction activities, including demolition and grading.

e. In order to prevent and minimize the occurrence and potential consequences of accidental spill of bulk materials at the site, the applicant shall operate the facility in accordance with a Spill Prevention Plan developed by the Applicant prior to the completion of construction of the Project. A copy of the plan shall be retained on site, and provided to Cowlitz County prior to completion of construction. The plan shall incorporate industry Best Management Practices as set forth in the SEPA Checklist Project Description.

f. The final pile installation method will be determined during the ESA consultation process with the NMFS and U.S. Fish and Wildlife Service. The removal of the creosote-treated piles will be consistent with the conditions and requirements of permits and approvals issued by local, state, and federal agencies. Pile driving activities will comply with guidance developed by the National Marine Fisheries Service (NMFS) for

monitoring and/or attenuating sound pressures generated during steel pile driving. Pile driving noise attenuation measures and monitoring are described in the biological evaluation for the Project developed as part of the Joint Aquatic Resource Permit Application (JARPA) permit submittal (Anchor QEA 2010b; Grette and Anchor QEA 2010).

g. Construction BMPs shall be incorporated into the construction of the Project in order to minimize the potential for waste materials to enter ground or surface waters. The BMPs to be implemented for the Project are provided in the SEPA Checklist Project Description.

h. Stormwater generated from the coal handling areas will be captured and reused as part of dust suppression. Stormwater and dust controls have been incorporated into the design of conveyors and the upgraded ship loader for Infrastructure Improvements. The stormwater and dust controls to be implemented for the Project are provided in the SEPA Checklist Project Description.

i. Wheel wash facilities will be incorporated into the design of truck loading facilities for cementitious products where necessary to control potential impacts to stormwater.

j. The management of shallow groundwater from any site areas with ongoing MTCA cleanup activities and which may be extracted during below-grade construction will be managed consistent with methods acceptable to Ecology's Industrial Program. This provision is not intended to apply to extraction of deep groundwater that is not impacted by MTCA cleanup activities, which may be used for fire control or industrial uses.

k. Wetland impacts from the Project will be mitigated for in accordance with the requirements of Cowlitz County Code 19.15.120 - Wetlands. A critical areas report will be submitted to the County that includes existing wetland areas, a summary of impacts to wetland areas, and proposed avoidance, minimization, and mitigation measures.

12. Plants and Animals

a. Disturbance of existing vegetation, beach substrate, and natural habitat features (e.g. logs, large rocks, stumps) shall be kept to the minimum necessary to accommodate the Project. Any areas inadvertently or accidental affected shall be restored to their pre-condition to the maximum extent practicable.

b. An ESA Biological Evaluation has been developed for the Dock Repair and Maintenance Project to address impacts to the federally listed species (Grette and Anchor QEA 2010). The BMPs and conservation measures included in that document will be employed, including any modifications based on the ESA consultation, to minimize impacts to federally listed species and will also provide protections for non-listed wildlife. Additional BMPs to be implemented for the Project are provided in the SEPA Checklist Project Description.

13. Energy and Natural Resources

a. The Project will comply with the energy conservation requirements of applicable codes and regulations, and they are implicitly included in the proposed Project.

b. The Infrastructure Improvement Project includes purpose-built equipment to minimize the energy required to offload, handle, and load bulk products during facility operation.

14. Aesthetics

a. It is recognized that the Project site and surrounding areas are zoned for industrial use and development.

However, the applicant shall maintain a(n) 100 foot setback/buffer of all material stockpiles along the perimeter of the site.

b. Existing trees and vegetation within the shoreline management zone shall be maintained to the maximum extent practicable to help minimize visual impacts.

c. The replaced ship loader shall be constructed on a lattice work structure to minimize visual impacts to the maximum extent practicable without affecting operations and/or worker safety.

15. Environmental Health

a. The risk of an unintentional release of fuel, lubricants, or hydraulic fluid from construction equipment will be minimized through the use of BMPs. The BMPs to be implemented for the Project are provided in the SEPA Checklist Project Description.

b. To reduce or control potential environmental health hazards, BMPs will be implemented during construction and operations (e.g., products handling). The BMPs to be implemented for the Project are provided in the SEPA Checklist Project Description.

c. The applicant shall comply with the requirements of Cowlitz County prior to occupying or using any unpermitted structure. Prior to County approval of occupancy or use of any existing unpermitted structure, the applicant will provide to the County for County approval, a review of such existing unpermitted structures that shall include with the necessary requirements for occupancy of the particular structure. The application shall implement those structural modifications prior to occupancy or use.

d. A demolition permit shall be obtained from Cowlitz County prior to the demolition of any structure.

e. Removal and management of asbestos-containing construction materials shall be conducted in accordance with applicable SWCAA and OSHA/WISHA requirements to ensure protection of air quality and worker safety.

f. The management of potentially contaminated soils or groundwater generated during construction activities shall be conducted in accordance with applicable MTCA, Dangerous Waste and Washington Solid Waste regulations. The management of materials from ongoing remediation areas shall be coordinated with Ecology's Industrial Group.

16. Noise

a. During construction and operation of the Project, noise at the site will be in compliance with County and State regulatory requirements for noise. As part of the operational safety plan, the applicant shall include required measures for worker and employee safety from noise impacts consistent with applicable State and Federal requirements for worker safety. Additional noise mitigating measures shall be used as necessary to meet the more stringent of the existing Cowlitz County Code or State of Washington noise impact regulations. Such mitigating measures may include the preparation of and compliance with a noise mitigation plan to be submitted to Cowlitz County.

17. Light and Glare

a. The applicant shall prepare a lighting plan for the Project to ensure that lighting is designed and installed in accordance with standard technical practices taking into consideration operator safety and functionality. Where feasible, exterior lighting shall generally be constructed and/or screened in a manner so as to minimize potential off-site impacts from light or glare. Adjustment of light direction and/or use of

supplemental light shields to provide additional screening may be used to minimize potential light spillover or direct glare in response to specific site conditions. The lighting plan shall be submitted to Cowlitz County prior to completing construction of the Project. The lighting plan shall include the requirement that lights on the ship loader will only be used during ship loading activities and will be directed into the hulls of the vessels being loaded or unloaded to the maximum extent practicable for effective operations and worker safety.

18. Historic and Cultural Preservation

a. Cultural/archaeological reviews of the areas of the site where excavations are likely to extend into native soils will be completed as part of Project permitting to be conducted with the Corps of Engineers where required under Section 106 of the National Historic Preservation Act.

b. The applicant shall develop an Unanticipated Discovery Plan to be implemented in the event that significant historic and/or cultural resources are discovered during the construction of the Project.

19. Public Services

a. Fire suppression systems on the site will be installed as required by applicable codes.

b. During vessel loading or unloading, Maritime Security (MARSEC) requirements consistent with the Department of Homeland Security's Homeland Security Advisory System (HSAS) will be complied with.

20. Transportation/Traffic

a. The applicant shall obtain all appropriate state and local permits associated with the delivery of oversized equipment associated with the Project prior to work within the state or county right of way and movement of oversized vehicles on state or county roads.

b. A traffic study acceptable to the Washington State Department of Transportation, Cowlitz County, and the City of Longview, shall be prepared by the applicant and submitted prior to the commencement of upland construction evaluating the potential impacts from car, truck, and train traffic from the proposed Project. The pending traffic study will identify required on or off-site transportation impacts and mitigation measures necessary to maintain the existing applicable levels of service set for in the Longview and/or Cowlitz County's Comprehensive Plans or other applicable jurisdictional standards. Where such plans do not identify a level of service for road/rail crossings, the study shall identify measures to mitigate the impacts of the anticipated longer crossing blocked times caused by the proposed unit trains consisting of approximately 125 rail cars. Millennium shall be responsible for a prorata share of reasonable and feasible mitigating measures for such improvements. All mitigation measures shall be installed or financial arrangements provided to ensure completion within 6 years of the permit issuance. All mitigation measures must be established, installed, or committed to through a development agreement executed with the appropriate jurisdiction prior to issuance of a certificate of occupancy or permit completion sign-off and the commencement of operations of the coal terminal facilities. Mitigation measures with an estimated cost of less than $200,000 each shall be completed within 2 years of permit issuance. The traffic study shall include at a minimum, the analysis identified in the attached scope of services, and shall be prepared by an engineer licensed in the State of Washington. The study shall include an evaluation of potentially feasible signaling and dispatching system improvements to assist emergency response vehicles in minimizing potential additional delays at road/rail crossings, and shall also include evaluation of potential safety and congestion improvements at road/rail crossings.

21. In addition, the applicant shall be required to comply with the Project Best Management Practices (BMPs) identified in the applicant's SEPA Checklist (dated 8-27-10), Project Description (dated August 2010) and SEPA supplemental memorandum (dated 9-14-10).

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Review Number 10-10-1184

Staff Contact: Tom McGuire, Environmental Planner

Responsible Official: Mike Wojtowicz, Director

Date: October 08, 2010 **Signature:**

cc with enclosures:

Board of County Commissioners
Washington State Department of Ecology, Helen Pressley
Washington State Department of Ecology, SEPA Center
Washington State Department of Fish and Wildlife, Steve West
Washington State Department of Natural Resources, Bryon Lawson
Washington State Department of Transportation, Jeff Barsnes
Office of Regulatory Assistance, Alan Bogner
U.S. Army Corps of Engineers, Danette Guy
U.S. Coast Guard
City of Longview, Jeff Cameron
Port of Kalama, Mark Wilson
Port of Longview
Port of Woodland
Longview Fire Department
Cowlitz County 911 Center
Cowlitz Fire and Rescue
Southwest Clean Air Authority
Cowlitz Public Utility District
Consolidated Diking Improvement District No. 1, Judi Strayer
Cowlitz Indian Tribe
Lower Columbia Fish Recovery Board
Burlington Northern Railroad
Burlington Northern, Longview Switching
Weyerhaeuser, Brian Wood
International Longshore and Warehouse Union, Robert Roden
Northwest Alloys
Columbia Riverkeeper
Chinook Ventures, Inc, Jason Oliver
(Property owners within 300 feet)

WAC 197-11-960 Environmental checklist.

ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. Name of proposed project, if applicable:

Millennium Bulk Logistics Longview Terminal Facility Maintenance and Improvements*

*Note: Scope of SEPA review includes two discrete and distinct projects:

- Dock Repair and Maintenance
- Infrastructure Improvements

2. Name of applicant:

Millennium Bulk Logistics, Inc. (Millennium)

3. Address and phone number of applicant and contact persons:

Lyle Hobbs, Millennium Bulk Logistics (Applicant), 170 South Main Street, Suite700, Salt Lake City, Utah 84101; Phone: (801) 712-7571

Derek Koellmann, Anchor QEA (Contact), 1605 Cornwall Avenue, Bellingham, Washington 98225; Phone: (360) 733-4311 ext. 221

4. Date checklist prepared:

October 6, 2010

5. Agency requesting checklist:

Cowlitz County (County) Department of Building and Planning

6. Proposed timing or schedule (including phasing, if applicable):

Dock Repair and Maintenance: The dock repair and maintenance project is expected to require between 4 and 8 weeks to complete. In-water work will be performed consistent with appropriate work windows intended to minimize potential disturbance of sensitive fish and wildlife. These work windows will be established as part of the permitting for the dock repair and maintenance and are expected to occur between the months of October and February.

Infrastructure Improvements: All infrastructure upgrades are expected to require approximately 12 to 18 months to complete:

- On-Dock Equipment: The installation of the on-dock equipment is expected to require approximately 3 months to complete. No in-water construction is required to complete these improvements.
- Initial Upland Improvements: Initial upland improvements are expected to be completed in approximately 6 months. This work includes construction of the main rail improvements, stockpiles, conveyor systems, and building improvements.
- Final Upland Improvements: The second rail dumper is expected to be completed in approximately 12 to 18 months, including associated rail and conveyor systems.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

The Millennium Bulk Logistics Longview Terminal Facility Maintenance and Improvements includes two discrete projects: dock repair and maintenance, and infrastructure improvements. There are no other current plans by Millennium associated with the existing multi-modal bulk materials handling facility (Site). NW Alloys Inc. (NW Alloys), the property owner, is proposing to conduct maintenance dredging activities in the Columbia River adjacent to the existing dock within the area known as "Berth 1." The Berth 1 maintenance dredging activities and associated environmental review and permitting will be conducted by NW Alloys, independent from the proposed activities.

Additional SEPA documentation will be developed for any future additions or expansions on or for additional products to be handled at the Site.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

The following documents have been prepared related to the Site:

- Impact of the Proposed Terminal at Chinook Ventures on the Capacity of the Columbia River System. Traffic study prepared by BST Associates. September 30, 2010.
- Sediment Sampling and Analysis Plan, Chinook Ventures Sediment Characterization Longview Washington. Prepared by Anchor QEA. August 2010.
- Remedial Investigation Report, Chinook Ventures, Inc. Longview Washington. Prepared by Anchor Environmental, L.L.C. June 2007.
- Millennium Bulk Logistics Dock Maintenance and Repair Project Biological Evaluation. Prepared by Grette Associates and Anchor QEA. August 2010.
- Millennium Bulk Logistics Dock Maintenance and Repair Project Stellar Sea Lion Monitoring Plan. Prepared by Grette Associates and Anchor QEA. August 2010.
- Millennium Bulk – Preliminary Transportation Findings Memorandum. Traffic study prepared by Transpo Group. October 5, 2010.
- Wetland Assessment Summary. Prepared by Parametrix. September 7, 2010.

- Wetland Delineation Report. Prepared by Anchor QEA. September 2010.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

All work currently proposed by Millennium is described in Attachment A – Project Description.

The Site is currently being operated by Chinook Ventures Incorporated (CVI). Prior to Millennium's acquisition of the assets of CVI, CVI may file a SEPA Checklist and project proposals for work that is largely different and distinct from the proposal presented here by Millennium, although certain aspects of the Millennium proposal and the anticipated CVI proposal are similar, such as the work necessary to meet agency curative requirements for activities occurring on-site prior to Millennium's acquisition of the assets of CVI. CVI has also initiated efforts to develop expanded terminal operations using many existing facilities and has initiated planning and environmental reviews necessary to support these potential future operations. Thus, Millennium and CVI proposals are very different, distinct, and separate. If Millennium does acquire the assets of CVI, then CVI's proposal will not proceed, and conversely, if Millennium decides not to proceed with the acquisition of CVI's assets, it is expected that CVI would continue to pursue its own project proposal. Any future new terminal operations that would be conducted by Millennium will occur only after conducting appropriate environmental review and permitting.

NW Alloys Inc. (NW Alloys), the property owner, is proposing to conduct maintenance dredging activities in the Columbia River adjacent to the existing dock within the area known as "Berth 1." The Berth 1 maintenance dredging activities and associated environmental review and permitting will be conducted by NW Alloys, independent from the proposed activities.

As described in Section 2.3 of the attached project description, a number of agencies have indicated that a number of remedial actions are necessary to correct permitting and compliance violations. CVI reports that it has initiated or will be initiating shortly various permitting actions to correct any permitting and compliance violations. Actions have been initiated by these agencies to ensure that deficiencies are corrected. Of these agency-required corrective activities, some may not be completed by the time that Millennium completes its acquisition of the Site assets from CVI. Millennium is working with each of the respective agencies to develop cures and implementation schedules for compliance issues associated with the Site that are not corrected before closing. Examples of the issues being addressed by the agencies include, but are not necessarily limited to, the following:

- Washington State Department of Ecology (Ecology): Repair of damage to the capped black mud pond, response to a previous spill of petroleum coke, implementation of measures to prevent spills and protect water quality, completion of wastewater/stormwater permitting and associated actions, permitting associated with solid waste management, and completion of Ecology process for the remedial investigation/feasibility study (RI/FS)

- Southwest Clean Air Agency (SWCAA): Permitting and pollution control measures associated with on-site industrial activities conducted by CVI
- U.S. Army Corps of Engineers (Corps): Permitting, mitigation, and/or removal of structures installed without applicable permits, and review of on-site wetlands
- Washington Department of Natural Resources (WDNR): Compliance with aquatic land lease requirements
- Washington State Department of Health: Connection to municipal potable water supplies, in lieu of operation and monitoring of an on-site treatment system for Site groundwater
- County: Review of structures and other activities conducted by CVI without applicable review and permitting, including definition of potentially required retrofits, repairs, or other corrective actions prior to approval of building occupancy or structure use
- Consolidated Diking and Improvement District (CDID): Levee repairs in area disturbed by CVI grading activities

10. List any government approvals or permits that will be needed for your proposal, if known.

Approvals and permits needed for the proposed Project include:

Dock Repair and Maintenance:

- County: Shoreline Substantial Development Permit or Shoreline Exemption
- Corps Nationwide Permit (NWP) 3
- Washington State Department of Fish and Wildlife (WDFW) Hydraulic Project Approval (HPA)
- County Construction Permits (e.g., building and fill and grade permits)

Infrastructure Improvements:

- County: Shoreline Substantial Development Permit, Critical Areas Review, and NDPES Construction Permit
- County: Clearing and Grading Permit
- SWCAA: Permit transfer and modification
- Corps Section 404 Individual Permit for wetlands fill
- County Construction Permits (e.g., building and fill and grade permits)

Other government approvals or permits may be required as a result of corrective actions or notices of violation for the Site. Issuance of any additional approvals or permits will be coordinated with the appropriate agencies and any necessary revisions to this SEPA Checklist as a result will be coordinated with the County

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need

to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

All work currently proposed by Millennium is described in Attachment A – Project Description.

Millennium proposes to acquire the assets of CVI and to assume operations of the Site located in Longview. The proposed work will be performed by Millennium after closing of the asset purchase, which is scheduled to occur in October of 2010.

The two projects described in this document are all necessary to support Millennium's proposed acquisition and operation of the bulk terminal at the Site. However, each project fulfills a discrete and distinct project purpose:

-
- Dock Repair and Maintenance: Repair and maintenance of the existing dock and associated dolphins as necessary to support continued shipments of alumina ore and remove unsafe conditions.
- Infrastructure Improvements: Upgrades to existing upland infrastructure and on-dock equipment in order to support imports of cementitious materials (cement and fly ash) and exports of coal from the bulk terminal.

The SEPA review is being conducted jointly for both projects to facilitate efficient and comprehensive review of Site-related environmental conditions, potential impacts, and appropriate mitigation measures. Additional information on the two projects and the Site can be found in Attachment A – Project Description.

The orientation of the various project elements detailed in this document is based on a project north orientation, as shown in the figures included in Attachment A – Project Description.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The Site is located along the Columbia River at 4029 Industrial Way in Longview, Washington, within Cowlitz County. The main entrance to the Site is located at the intersection of Industrial Way (State Route [SR] 432) and 38th Avenue. The proposed activities are located in portions of Sections 30 and 31 of Township 8 North, Range 2 West and Sections 25, 26, 35, and 36 of Township 8 North, Range 3 West of the Willamette Meridian. A vicinity map and site plan are included in Attachment A.

B. ENVIRONMENTAL ELEMENTS

1. **Earth**

a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other . . . . . .

The Site is generally flat. There are a number of steep slopes associated with on-site levees along the Columbia River that are managed and maintained by the CDID. Bathymetry in the nearshore slopes gently from the shoreline to the navigation channel where it then steeply drops off.

b. What is the steepest slope on the site (approximate percent slope)?

The majority of the Site contains a slope of less than 2 percent. The CDID ditches have steeper slopes from the top of bank to the water surface. The CDID dikes are constructed at an approximately a 3:1, or 33 percent, slope.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

Soils found on the Site are primarily clay and loam with the exception of an area of peat soils found in the northeastern portion of the property. The Natural Resource Conservation Service (NRCS) Web Soil Survey map for Cowlitz County identifies six different soil series on the Site including Arents, Caples silty clay loam, Maytown silt loam, Pilchuck loamy fine sand, Semiahmoo muck, and Snohomish silty clay loam (NRCS 2010). No prime farmland exists on the Site. Soils within the Site have been significantly disturbed by historic grading, filling, and excavation activities associated with historic and current industrial activities.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

There are no surface indications or history of unstable soils at the Site.

e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

No filling or grading is proposed for the Dock Repair and Maintenance project.

Filling and grading will occur for the Infrastructure Improvements project. Project elements that will necessitate filling and grading activities include new rail facilities, railcar dumpers, access roads, a new coal stockpile, and the foundations of any new structures or buildings. Any imported fill will come from an approved and permitted source.

The fill and grade quantities for the Infrastructure Improvements project are detailed in Table 1.

Table 1

Proposed Fill and Grade Quantities for Infrastructure Improvements*

Project Element	Fill Quantities (in cubic yards)	Grade Quantities (in cubic yards)
Rail Facilities	42,000	30,000
Railcar Dumpers	12,500	30,000
Access Roads	3,500	3,900
Coal Stockpile	33,500	10,000
Foundations	180	650

* The fill and grade volumes in Table 1 are estimates based on preliminary design; final volumes will be determined and submitted with the grading permit for the project.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Some temporary erosion could occur during clearing and construction activities.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

The Site is an existing industrial site containing large areas of impervious surfacing (primarily asphalt, concrete, and buildings). A GIS analysis was completed for the site to determine the extent of existing impervious surfacing on the site. This analysis was only conducted for the portion of the property south of Industrial Way because there are no planned improvements on the portion of the site that is located north of Industrial Way. The portion of the property south of Industrial Way is approximately 440 acres in size. Of the 440 acres, approximately 120 acres is currently covered with impervious surfaces. Graveled areas were not included as impervious surfaces for this analysis.

The Dock Repair and Maintenance project will not increase impervious surfaces at the Site. The Infrastructure Improvements project will increase the total impervious surface area at the Site by approximately 40,000 square feet (sf) after Project construction.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

The Project will adhere to both Ecology and County requirements for stormwater detention and treatment. Project erosion control Best Management Practices (BMPs) will be implemented to avoid or minimize adverse impacts. Dust suppression systems will be installed at open stockpiles and at all conveyor discharge and transfer points to prevent the release of potential fugitive dust onto the Site. Temporary Erosion and Sediment Control (TESC) plans will be completed prior to and implemented during construction phases that involve clearing, grading, or alterations that could result in erosion.

2. **Air**

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

The Dock Maintenance and Repair project will result in short-term emissions of exhaust from the heavy equipment used to complete the maintenance and repair activities. It is expected that this equipment will be gasoline or diesel powered. No long term emissions will result from this project.

The Infrastructure Improvements project will also will result in short-term emissions of exhaust from the heavy equipment used to construct new infrastructure. It is expected that this equipment will be gasoline or diesel powered.

Ongoing emissions of exhaust and dust resulting from operation of the Site after completion of the Infrastructure Improvements project are anticipated to be significantly less than those occurring when the Site was recently used as an aluminum smelter. The ongoing emissions resulting from the operation of the Site after completion of the Infrastructure Improvements include:

Transportation Sources:

a. Diesel exhaust from trucks, trains, and vessels loading and off-loading at the Site
b. Bunker-oil exhaust from ships and barges while loading and off-loading at the Site
c. Gasoline exhaust from cars and operations equipment

On-Site Sources:

d. Dust from bulk material stockpiles and handling systems

The Infrastructure Improvements provide for efficient cargo handling of coal and cement products. The use of purpose-built, electrically-powered equipment for unloading, conveying, stockpiling, and shiploading activities provides a more efficient handling system for the bulk products than alternative systems that were considered but not proposed by Millennium. The use of such electrically powered equipment reduces overall power consumption rates. It further minimizes operational emissions of exhaust and associated green house gasses, because electrical power servicing the Site is obtained from Cowlitz County Public Utility District, which currently obtains approximately 90 percent of its energy from non-fossil fuel sources (http://www.cowlitzpud.org/fuel_mix.php). This minimizes indirect, off-site emissions associated with the production of the energy used for facility operations.

The siting of the bulk terminal facility also provides a method for minimizing indirect greenhouse gas emissions associated with non-Millennium transportation of bulk products from the manufacturing/mining location to their point of use. For coal, the Site is located closer (by rail travel distance compared to alternate locations evaluated by Millennium) to the various mines that

are expected to ship coal through the terminal during initial operations. This proximity reduces off-site transportation-related emissions of exhaust and greenhouse gasses of the terminal customers compared to development of a bulk terminal in alternate locations. Similarly, the bulk terminal provides for efficient regional transportation of cement products, reducing fossil fuel use associated with transportation of cement products from origin to point of use.

As a bulk products terminal, Millennium is not required to conduct greenhouse gas reporting under current state, local, or federal regulations. However, as part of its commitment to sustainable business practices, Millennium proposes to develop a baseline greenhouse gas emissions estimate for Millennium's bulk terminal operations. This estimate will be prepared following final design and permitting, so that any final project changes during design/permitting can be reflected in those estimates. The emissions estimate shall be performed consistent with the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard, a set of standards developed on behalf of the World Resources Institution and the World Business Council for Sustainable Development. The emissions estimates will include Scope 1 and Scope 2 emissions from activities under the organizational and operational control of Millennium. The baseline report shall quantify baseline terminal emissions on a "per ton" basis for products handled at the facility, and on an estimated "annual total" basis consistent with anticipated operating levels. The report shall identify measures that have been taken to minimize the greenhouse gas footprint of the terminal, and shall evaluate other potentially feasible measures that could be used to further minimize greenhouse gas emissions associated with bulk product handling operations.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

There are no off-site sources of emissions or odor that may affect the proposed projects.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

The project will adhere to applicable regulations for the reduction or control of emissions. The Project BMPs will be implemented to avoid or minimize adverse impacts to the air during maintenance, and overall construction activities. Measures include conducting regular inspections of equipment to ensure that uncontrolled emissions do not occur and watering roads to reduce fugitive dust being released into the air.

During operations, conditions enforced by existing and future SWCAA permits will be adhered to. Additionally, dust suppression systems will be installed at open stockpiles and at all conveyor discharge and transfer points to prevent the release of potential fugitive dust onto the Site. Proposed facility design, operational practices, and siting considerations are intended to minimize emissions of exhaust and direct and indirect greenhouse gas emissions.

Overall air emissions are expected to be less than those occurring when the Site was operated as an aluminum smelter by Reynolds.

3. **Water**

a. Surface:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

The Columbia River is located at the south side of the Site. This portion of the Columbia River is freshwater and tidally influenced.

Several areas of apparent wetlands were identified as part of a wetland reconnaissance conducted by Parametrix on behalf of CVI. These features are detailed in a Wetland Assessment Summary for the Site prepared by Parametrix on September 7, 2010, under separate cover. Per the Wetland Assessment Summary, up to 21 identified wetlands or jurisdictional features exist on the Site. Additional wetland areas may exist and are being evaluated as part of an ongoing wetlands delineation process conducted by Parametrix for CVI with planned review by the Corps. Anchor QEA conducted a separate Wetland Delineation Report for Millennium in September 2010 (under separate cover) to confirm the presence of wetlands or jurisdictional features potentially impacted by proposed activities in the western portion of the Site. A separate wetland delineation is currently being conducted in the eastern portion of the Site by Anchor QEA to confirm the presence of wetlands or jurisdictional features potentially impacted by proposed activities. The results of this delineation will be provided to the County and appropriate agencies immediately following completion.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

Dock Repair and Maintenance

The following in-water maintenance activities are proposed for the Dock Repair and Maintenance project (additional detail on these activities can be found in Attachment A – Project Description):

- Pile Repair/Replacement
- Dolphin Repair/Replacement
- Removal of CVI Ship Loader Piling

The following over-water maintenance activities are proposed for the Dock Repair and Maintenance project (additional detail on these activities can be found in Attachment A – Project Description):

- Replace Damaged Walkway
- Restore Reynolds Conveyor
- Remove CVI Ship Loader

- Replace Northern Reynolds Loader Foundation Platform
- Repair Fire Control System

Not counting the removal of the CVI ship loader piles (four piles), the project results in a net reduction of 60 piles associated with the Reynolds Dock. The project also results in a substantial reduction in the number of creosoted piles in the existing structure. A total of 156 creosote piles will be removed from the Columbia River as part of this project.

Infrastructure Improvements

The Infrastructure Improvement project includes construction (predominantly associated with the rail improvements) in on-site wetland areas identified during previous surveys. A wetland delineation to verify current wetland boundaries is ongoing, including a pending Site inspection and jurisdictional review by the Corps. The extent of wetland impact will be evaluated following completion of this effort. The extent of impact is expected to exceed 0.5 acre and, therefore, will not likely qualify for a Corps NWP for linear transportation projects.

Over-water work is included in the Infrastructure Improvement project. Information on the over-water work activities can be found in Attachment A – Project Description. Elements of over-water work include the following:

- New On-Dock coal Conveyor
- New belt conveyor supports installed above the OHWM and MHHW
- Upgraded On-Dock Ship Loader including directional lighting
- Cementitious Materials Receiving Equipment
- Cementitious Materials Conveyor System

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

Dock Repair and Maintenance

No fill or dredge material will be placed or removed for the Dock Repair and Maintenance project.

Infrastructure Improvements

The Infrastructure Improvement project includes construction in on-site wetland areas identified during previous surveys. To accommodate the proposed rail improvements, fill will need to be placed within on-site wetlands. A wetland delineation to verify current wetland boundaries is ongoing, including a pending site inspection and jurisdictional review by the Corps. The extent of wetland impact and the associated required amount of fill to be placed within wetlands will be evaluated following completion of this effort.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

The proposal will not require any surface water withdrawals or diversions.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

In-water and over-water work being conducted in the Columbia River will occur within a 100-year floodplain. According to the Federal Emergency Management Agency (FEMA) Cowlitz County Flood Insurance Rate Maps (FIRMs) the Columbia River, waterward of the CDID No. 1 dike that runs parallel to the shoreline, is documented as an A4-rated floodplain (FEMA 1993). Floodplains rated A1 through A99 are areas of 100-year flood, and base elevations and flood hazard factors are already determined in these areas (FEMA 1993).

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

The proposal does not involve any discharges of waste materials to surface waters. An unintentional release of fuel, lubricants, or hydraulic fluid from construction equipment could occur. The risk of such a release will be minimized through the use of BMPs as described in Attachment A – Project Description.

The new purpose-built coal conveyors, the replacement ship loader, and the pneumatic conveyor to be used for cementitious materials handling include provisions to minimize the risk of spills or discharges of dust or stormwater to the environment. These provisions are described in Attachment A – Project Description.

b. Ground:

1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

Groundwater will be withdrawn from existing on-site industrial water supply wells to accommodate dust suppression related to the stockpiles and to accommodate fire flow needs on-site. Dust suppression systems will be installed at open stockpiles and at all conveyor discharge and transfer points to prevent the release of potential fugitive dust onto the Site. Fire suppression systems on the Site will be installed as required.

Temporary extraction of shallow groundwater during construction dewatering may be required for construction of the rail unloading structures during the Infrastructure Improvements project. Groundwater treatment and discharge measures will be coordinated with Ecology's Industrial Program.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.).

Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

No waste materials will be discharged into the ground. Waste management is currently conducted on-site at the existing sewage treatment plant as detailed under separate cover in the Site Solid Waste Plan (CVI 2009).

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Approximately half of the Site's current stormwater discharge flows into the CDID ditch system, which surrounds the north and west sides of the property. CDID pump stations pump stormwater from the ditches into the Columbia River. The on-site stormwater treatment plant (known as "Facility 73") collects and treats stormwater from the developed areas of the Site (with the exception of the main parking lots) and the ditches on the east side of the Site. The on-site wastewater treatment plant treats leachate from the Closed Black Mud Pond to the north and stormwater from the existing cryolite ditches at the southeast side of the Site.

Stormwater management for the new coal handling areas (stockpiles, etc.) will include provisions for stormwater capture and reuse as part of dust suppression systems. A storage pond is included in the design for this purpose as described in Attachment A – Project Description.

2) Could waste materials enter ground or surface waters? If so, generally describe.

Construction BMPs are incorporated into the construction of each both projects in order to minimize the potential for waste materials to enter ground or surface waters as described in Attachment A – Project Description.

Stormwater generated from the coal handling areas will be captured and reused as part of dust suppression. Stormwater and dust controls have been incorporated into the design of conveyors and the upgraded ship loader for Infrastructure Improvements as described in Attachment A – Project Description. Provisions have been included for control of fugitive emissions and stormwater impacts for cementitious materials handling.

It is unlikely that waste materials would enter ground or surface waters from diesel-powered construction equipment at the Site, although there is a chance that a minor fuel spill could occur during construction. Risks of spills during construction are being managed through BMPs as described in Attachment A – Project Description.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

Any wetlands impacts will be minimized where practicable, and will be appropriately mitigated. Mitigation for wetland impacts may include purchase of wetland mitigation credits available from the Lower Columbia River Mitigation Bank. Impacts to wetlands will be mitigated for in accordance with applicable local, state, and federal regulations and associated mitigation ratios determined during project permitting.

On-site stormwater will be collected and treated as required by Ecology and County stormwater standards. Runoff from the coal stockpile will be collected and beneficially reused for dust suppression.

During construction, the contractor will be responsible for creating and following Spill Prevention, Control, and Countermeasures (SPCC) and TESC plans. Other BMPs will be employed as necessary to avoid or reduce any possibility of waste materials being discharged to surface or ground waters. During operations, the Project will comply with permit applications to reduce or control potential surface, ground, and runoff water impacts.

4. **Plants**

a. Check or circle types of vegetation found on the site:

X deciduous tree: alder, maple, aspen, other: cottonwood, willow

_____ evergreen tree: fir, cedar, pine, other

X shrubs:

X grass:

_____ pasture

_____ crop or grain

X wet soil plants: cattail, buttercup, bullrush, sedge, skunk cabbage, other

_____ water plants: water lily, eelgrass, milfoil, other

X other types of vegetation

Shoreline vegetation and habitat value is limited due to extensive diking and riprap along the shoreline of the Columbia River. Vegetation in the area exists in a narrow strip between the dike and the Columbia River and is primarily composed of willow (*Salix* spp.), red elderberry (*Sambucus racemosa*), cottonwood (*Populus* spp.), rushes (*Juncus* spp.), sedges (*Carex* spp.), and various non-native shrubs and grasses including Himalayan blackberry (*Rubus armeniacus*).

Upland vegetation on the site is also limited due to existing industrial uses and previous clearing activities. Trees on the site consist primarily of willow, cottonwood, and Western red cedar (*Thuja plicata*). Other upland Wetland vegetation consists primarily of rushes, and sedges. Western sword fern (*Polystichum munitum*) and a variety of non-native grasses and shrubs including reed canary grass (*Phalaris arundinacea*), fox glove (*Digitalis purpurea*), Scot's broom (*Cytisus scoparius*), bull thistle (*Cirsium vulgare*) and Himalayan blackberry are also present on site.

Vegetation within the potential wetlands or jurisdictional features at the Site includes rushes such as native soft rush (*Juncus effuses*) and cattail (*Typha latifolia*), reed canarygrass, sedge, and several tree species including cottonwood (*Populus balsamifera* var. *trichocarpa*), and alder (*Alnus rubra*) (Parametrix 2010).

b. What kind and amount of vegetation will be removed or altered?

In most areas where development is proposed, proposed activities will occur on previously developed areas.

No vegetation will be removed or altered for the Dock Repair and Maintenance project.

The Infrastructure Improvement project will result in impacts to upland and wetland vegetation. Approximately 10 acres of total vegetation will be removed or altered to accommodate development of the rail facilities and other infrastructure improvements. Potential plant species that could be impacted as a result of vegetation removal are detailed above. A wetland delineation to verify current wetland boundaries is ongoing, including a pending site inspection and jurisdictional review by the Corps. The extent of wetland vegetation impact will be evaluated following completion of this effort.

c. List threatened or endangered species known to be on or near the site.

No threatened, endangered, rare, or imperiled plant species are documented to occur on or near the Site according to the WDNR Natural Heritage Program (NHP) Geographic Information System (GIS) database (WDNR 2010). The U.S. Fish and Wildlife Service (USFWS) identifies Nelson's checkermallow (*Sidalcea nelsoniana*) to occur within Cowlitz County, but the Site does not contain the appropriate habitat for the species nor is it documented to occur on-site via the WDNR NHP database.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

Proposed measures to preserve vegetation on the Site include placing proposed development within the footprint of previously developed areas, where feasible. Wetlands vegetation will be preserved where practicable, and impacts to wetlands vegetation will be appropriately mitigated. Mitigation for wetland impacts may include purchase of wetland mitigation credits available from the Lower Columbia River Mitigation Bank. Impacts to wetlands will be mitigated for in accordance with applicable local, state, and federal regulations, and associated mitigation ratios determined during project permitting.

5. **Animals**

a. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site:

birds: hawk, heron, bald eagle, songbirds,
other: osprey, other birds of prey corvids, waterfowl,
mammals: deer, bear, elk, beaver, other: marine mammals (harbor seals, California sea lions, Steller sea lions), weasels, mink, small mammals (mice, voles, moles, etc.)
fish: bass, salmon, , herring, shellfish, other: steelhead, sturgeon, northern pikeminnow, etc.

b. List any threatened or endangered species known to be on or near the site.

There are several threatened or endangered species known to live or spawn in the Columbia River, adjacent to the Site. These include the following:

- Chinook Salmon (*Oncorhynchus tshawytscha*) – Lower Columbia River Evolutionarily Significant Unit (ESU), Upper Columbia River Spring Run ESU, Snake River Spring/Summer Run ESU, Snake River Fall Run ESU, Upper Willamette River ESU
- Chum Salmon (*O. keta*) – Columbia River ESU
- Coho Salmon (*O. kisutch*) – Lower Columbia River ESU
- Sockeye Salmon (*O. nerka*) – Snake River ESU
- Steelhead Trout (*O. mykiss*) – Lower Columbia River ESU, Middle Columbia River ESU, Upper Columbia River ESU, Snake River Basin ESU, Upper Willamette River ESU
- Bull Trout (*Salvelinus confluentus*) – Lower Columbia River Distinct Population Segment (DPS)
- North American Green Sturgeon (*Acipenser medirostris*) – Southern DPS
- Columbia River Smelt (Eulachon) (*Thaleichthys pacificus*) – Southern DPS
- Steller Sea Lion (*Eumetopias jubatus*)

c. Is the site part of a migration route? If so, explain.

The Site is within the Pacific Flyway for migrating waterfowl, so during the migratory season, the Site could conceivably be frequented by migrating waterfowl. Fish (e.g., salmonids, euchalon, and sturgeon) and marine mammals (e.g., harbor seal, California sea lion, and Steller sea lion) are also known to migrate through the Columbia River.

d. Proposed measures to preserve or enhance wildlife, if any:

The project will adhere to applicable regulatory requirements related to the preservation of animals. ESA Biological Evaluations have been developed for the Dock Repair and Maintenance project to address impacts to the federally listed species (Grette Associates and Anchor QEA 2010). The BMPs and conservation measures included in those documents will be employed to minimize impacts to federally listed species and will also provide protections for non-listed wildlife.

Additional BMPs to preserve or enhance wildlife are included in Attachment A – Project Description.

6. **Energy and natural resources**

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Electricity, natural gas, gasoline, and diesel will be used on-site to meet the completed project's energy needs. Electricity will be used to operate conveyors and supporting equipment. Gasoline and diesel will be used to operate trucks, welders, and various maintenance equipment. Natural gas will be used to heat water for showers and other sanitary uses; no industrial activities are anticipated to use natural gas.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

The Project will comply with the energy conservation requirements of applicable codes and regulations, and they are implicitly included in the proposed Project.

The Infrastructure Improvement project includes purpose-built equipment to minimize the energy required to offload, handle, and load bulk products during facility operation.

7. **Environmental health**

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

Dock Repair and Maintenance

This project is limited to the repair and maintenance activities necessary to restore the existing dock, dolphins and pilings to a safe working condition. Additionally, the CVI conveyor and ship loader currently located on the dock will be removed as part of this project, and the fire control system will be repaired as part of this project. Compliance with BMPs will maintain water quality during construction, ensure safe removal and appropriate disposal of generated wastes (e.g., removed creosote pilings and dock materials), and protect against the risk of spills (e.g., spills of fuel from contractor work equipment) from construction activities.

Infrastructure Improvements

This project includes the development of new infrastructure for safe and efficient bulk handling of coal and cementitious materials. Measures are incorporated into the proposed project design to protect air and water quality from dusts, spills, and stormwater impacts. Facility design for coal

handling systems includes dust suppression measures, appropriate equipment selection, and stockpile management practices protect against the risk of fire. Compliance with BMPs will maintain water quality during construction, ensure safe handling of soils, groundwater, and debris generated during the construction work, and protect against the risk of spills (e.g., spills of fuel from contractor work equipment) from construction activities. Invasive work in upland areas of the Site subject to ongoing Model Toxics Control Act (MTCA) investigation and cleanup actions overseen by Ecology are being coordinated with Ecology to ensure that the proposed actions do not interfere with ongoing cleanup activities, and to ensure that all generated materials are appropriately managed.

Construction BMPs for both projects are described in Attachment A – Project Description.

1) Describe special emergency services that might be required.

Fire protection and emergency medical service are provided by Cowlitz County Fire Protection District No. 2 (Cowlitz 2 Fire & Rescue), which annexed the facility into its fire district effective May 2010. Cowlitz 2 Fire & Rescue is staffed with both full paid and volunteer firefighters with at least three engine companies on duty each day, which run either an ALS medic unit or engine as needed. Cowlitz 2 Fire & Rescue provides emergency medical response and transport with ambulances staffed with firefighter/paramedics and firefighter emergency medical technicians. Cowlitz 2 Fire & Rescue is currently engaged in a pre-fire planning process for the facility and has indicated a desire to work with Millennium to proactively provide pre-fire and emergency medical planning for any new facilities or operations. Finally, Cowlitz 2 Fire & Rescue provides life safety and fire plan review for the unincorporated areas of Cowlitz County under agreement with Cowlitz County. Therefore, Cowlitz 2 Fire & Rescue will review any building permit applications for the site.

Police service for the site is provided by the Cowlitz County Sheriff Department.

The Project will comply with all applicable regulations related to emergency services. No special emergency services are anticipated to be needed for the Project. Millennium will work with the County and appropriate agencies to identify any special emergency services that may be required.

2) Proposed measures to reduce or control environmental health hazards, if any:

The Project will comply with all applicable regulations related to environmental health. To reduce or control potential environmental health hazards, BMPs will be implemented during construction and operations (e.g., products handling). The anticipated BMPs are described in Attachment A – Project Description.

As described in Section 2.3 of Attachment A – Project Description, numerous regulatory compliance issues have been identified by regulatory agencies during CVI operations. Actions have been initiated by these agencies to ensure that deficiencies are corrected. Of these activities, some may not be completed by the time that Millennium completes its acquisition of the Site assets from CVI. Millennium is working with each of the respective agencies to develop cures and implementation schedules for compliance issues associated with the Site that are not corrected before closing.

b. **Noise**

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

None.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Short-term increases in noise may occur from construction activities. Long-term noise from the Site includes noise from heavy equipment operating on-site and from trucks, train, and vessel traffic. Operations at the Site are anticipated to occur on a continuous basis, and operations will be performed in accordance with County requirements for noise.

Overall noise expected to be lesser than when the Site was operated as an aluminum smelter by Reynolds.

3) Proposed measures to reduce or control noise impacts, if any:

On-site operations will be performed in accordance with County requirements for noise.

8. **Land and shoreline use**

a. What is the current use of the site and adjacent properties?

The Site is located at the former Reynolds aluminum facility in Longview, in Cowlitz County, Washington. CVI acquired the Site assets after aluminum operations were suspended, and has been using the facility for various functions including the bulk transport of alumina and other products. The existing facilities and infrastructure (including the buildings and trestle and dock) are currently owned and operated by CVI. Attachment A – Project Description includes a description of current Site and adjacent property uses.

The Site comprises approximately 460 acres, and is bounded by the Columbia River on the south, and drainage ditches on the north, east, and west. The drainage ditches are operated by the CDID, which also manages the levee located within the Site along the Columbia River shoreline. The

ditches include CDID Ditch No. 14 to the west, CDID Ditch No. 10 to the north, and CDID Ditch No. 5 to the northeast. The property is bordered by the Weyerhaeuser industrial facility to the east.

The Site is located in unincorporated Cowlitz County, in an area zoned for industrial uses. Industrial Way (SR 432) is the nearest transportation corridor and it extends through the north side of the property. The Site includes multiple driveway access points, and connections to mainline rail operated by Burlington Northern Santa Fe (BNSF) railroad.

b. Has the site been used for agriculture? If so, describe.

The Site has not been used for agriculture.

c. Describe any structures on the site.

Upland structures that were originally constructed by Reynolds and that remain within the Site include the following:

- Four main office buildings
- Maintenance sheds
- Pot-lines for storage of materials and electrostatic precipitator (ESP) cast house
- Two cast house buildings
- A combined stormwater and wastewater treatment facility
- An industrial wastewater treatment plant
- A sanitary sewer treatment plant
- A carbon plant
- A dock and trestle and associated dolphins for vessel berthing
- An existing ship berth that has been periodically dredged to support alumina shipments
- A vacuum ship unloader used for alumina shipments
- An additional ship loader originally installed by Reynolds
- A conveyor system extending from the vacuum unloader to upland storage silos
- Holding tanks and silos originally constructed by Reynolds for aluminum facility operations
- The former cable plant building and associated structures
- Rail facilities associated with the original Reynolds operations

Since acquisition by CVI, some of the above-listed structures have been modified, and additional structures have been constructed. A number of agencies have indicated that some of these modifications and new structure construction were conducted without appropriate permits and agency review. Examples of structures and Site features that Millennium has been advised were installed by CVI include the following:

- A stockpile for storage of petroleum coke and coal
- Conveyors for bulk material handling, including upland and on-dock conveyors

- A new ship loader constructed on piles and located adjacent to the Reynolds dock
- New on-site rail spurs
- Modifications to the existing pot-line buildings to support CVI bulk storage operations
- Miscellaneous clearing and grading activities

d. Will any structures be demolished? If so, what?

Currently, the following structures are proposed to be removed or demolished:

- CVI loader and piles
- CVI conveyors on the existing trestle
- Upland CVI conveyors
- Two existing storage buildings to facilitate the stockpile
- Other infrastructure in the location of the proposed dome storage buildings

Any remaining unpermitted infrastructure will be evaluated to determine whether it can be retroactively permitted or should be demolished. Additional structures may be demolished to accommodate the Infrastructure Improvements project; however, the specific buildings to be demolished have not been identified. Demolition permits from the County will be obtained for any structures to be demolished. Any infrastructure on-site that Millennium is advised lacks the property permitting and that is contemplated for use by Millennium will undergo a review by Millennium and the County to determine the applicable requirements to be implemented prior to reuse. As stated in the Project Description in Attachment A, Millennium will comply with the requirements of the County prior to occupying or using any unpermitted infrastructure.

e. What is the current zoning classification of the site?

The portion of the Site where the three projects will occur is within Cowlitz County jurisdiction and zoned as Heavy Manufacturing (MH) (Cowlitz County 2010). The property north of Industrial Way where no project-related activities are proposed is within City of Longview jurisdiction and zoned as Manufacturing District (M-2) (City of Longview 2010).

f. What is the current comprehensive plan designation of the site?

The portion of the Site south of Industrial Way and adjacent to the shoreline is designated as Industrial Heavy and the Columbia River is designated as Forestry Open Space by the County (Cowlitz County 2010) and Heavy Industrial by the City of Longview (City of Longview 2008).

The property north of Industrial Way where no project-related activities are proposed is designated as Mixed Use Commercial/Industrial by the City of Longview (City of Longview 2008).

g. If applicable, what is the current shoreline master program designation of the site?

The most recently adopted County Shorelines Management Master Program designates the Site as Urban (Cowlitz County 1977).

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

The Columbia River, Columbia River shoreline, Columbia River floodplain, and wetlands have all been identified as environmentally sensitive or critical areas per the Cowlitz County Code 19.15. Additionally, the reach of the Columbia River adjacent to the project site is designated as critical habitat for 12 populations of salmon and steelhead for migration and rearing. This reach is also designated as critical habitat for the Southern Distinct Population Segment (DPS) of North American green sturgeon for over-summering habitat. The Lower Columbia River is included in proposed revised bull trout critical habitat listing published January 14, 2010 (USFWS 2010) ,based on its importance as forage, migration, and overwintering (FMO) habitat (USFWS 2009). For bull trout, the project area waterward of 10.75 feet MLLW (13.5 feet NAVD 88) is proposed critical habitat.

i. Approximately how many people would reside or work in the completed project?

Currently, there are approximately 60 employees on average that work at the facility. The completed Project is expected to provide up to approximately 70 full-time family wage jobs.

There will be an average of an additional 125 additional full time construction jobs during the 18-month construction phase of the project.

Including direct and indirect jobs, applying the standard multiplier for port jobs, this Project could result in 337 jobs during the construction phase and 202 permanent full-time family wage jobs in the community.

j. Approximately how many people would the completed project displace?

None.

k. Proposed measures to avoid or reduce displacement impacts, if any:

None.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

Millennium's proposal includes addressing and implementing cures for those existing regulatory violations that have been identified by the applicable agencies necessary to bring the Site into

regulatory compliance. If Millennium does not acquire the assets of CVI, then the regulatory agencies will address any existing Site permitting issues with CVI.

Millennium will comply with all applicable regulations and requirements.

The proposed Project will result in continued use of the property as an industrial facility, which is compatible with current and projected land uses and plans.

9. **Housing**

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

Housing units are not included in the proposed Project.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

No housing units would be eliminated by the proposed Project.

c. Proposed measures to reduce or control housing impacts, if any:

No housing currently exists on-site; therefore, no measures to reduce or control housing impacts are proposed.

10. **Aesthetics**

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

No new structures are proposed for the Dock Repair and Maintenance project.

For the Infrastructure Improvements project, the replaced ship loader will be constructed to a height of approximately 124 feet Columbia River Datum (CRD; 103 feet above the existing dock surface). The existing alumina unloader is constructed to a height of approximately 121 feet CRD (100 feet above the existing dock surface). The tallest point of the proposed conveyor belt system is 79 feet CRD (62 feet above the existing dock surface). The proposed ship loader and conveyor system will retain the existing industrial character of the dock.

b. What views in the immediate vicinity would be altered or obstructed?

Views in the immediate vicinity of the Site will not be obstructed, and will only be slightly altered as a result of the installation of the proposed ship loader and conveyor. The Site will retain its existing industrial character.

c. Proposed measures to reduce or control aesthetic impacts, if any:

The proposed activities include dock repair and maintenance and overall Site improvements. These activities will result in an improved aesthetic quality at the Site from existing conditions. All new structures at the Site will be commensurate in design to the existing structures to reduce and control any potential aesthetic impacts. The replaced ship loader will be constructed on a lattice work structure to further minimize visual impacts. Reduction of the number of piles and replacement of existing creosote wood piles with steel piles will also enhance and improve the aesthetic quality of the Site.

11. **Light and glare**

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

The existing light and glare at the property is typical to industrial sites. During the proposed construction and maintenance, additional lighting during dawn and dusk may be necessary. New directional lighting will be installed on the replaced ship loader on the spout and end of the boom. On-ship lighting will also occur when a ship is at berth. The coal stockpile will be continuously lighted. Lighting for the coal stockpile will be directed to the stockpile.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

Light and glare from the Project will not be a safety hazard or interfere with views.

c. What existing off-site sources of light or glare may affect your proposal?

No existing off-site sources of light or glare will affect the Project.

d. Proposed measures to reduce or control light and glare impacts, if any:

The project will comply with all applicable regulations. Further, to reduce or control potential light and glare impacts, new lights are directed toward the area that requires additional light to the extent practicable. All new lighting on-site will be developed in accordance with County standards. Lights on the loader will only be used during ship loading activities and will primarily be directed into the hulls of the vessels being loaded.

12. **Recreation**

a. What designated and informal recreational opportunities are in the immediate vicinity?

Recreational boating and fishing opportunities exist in the Columbia River, adjacent to the Site. The property to the west of the Project, a closed wood waste landfill, is vacant and used primarily for recreation purposes such as off-road vehicle use.

b. Would the proposed project displace any existing recreational uses? If so, describe.

The proposed Project will not displace any existing recreational uses on or adjacent to the Site.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

None necessary.

13. **Historic and cultural preservation**

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

No archaeological or historical surveys have been conducted in the project area. The Department of Archaeology and Historic Preservation's WISAARD database was reviewed on August 9, 2010. The search revealed no recorded sites on or near the property. No cultural resources surveys have been conducted on the property. The nearest recorded archaeological site was 45CW003, a burial location that was destroyed in the 1940s by gravel mining operations. It is approximately 0.5 mile upriver (southeast) from the project location. There are no other recorded sites within approximately 2 miles of the project location. The nearest historic structures are buildings in downtown Longview and on Mt. Solo, all of which are more than 2 miles from the project location.

b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

There are no known landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on to the Site. Any intact native soil/sediments on the project site have a moderate to high probability for archaeological resources. Ground disturbing work that will extend beyond the demonstrated limits of fill is likely to occur in the upland. A monitoring and discovery plan will be prepared for the event that cultural or archeological resources are identified during the course of construction The projects require multiple permits from the Corps, and therefore must comply with Section 106 of the National Historic Preservation Act. Any necessary cultural resources work would be conducted in compliance with Section 106 regulations and guidelines.

c. Proposed measures to reduce or control impacts, if any:

Ground-disturbing work that will extend beyond the demonstrated limits of fill or disturbance will require archaeological survey, in compliance with Section 106 of the National Historic Preservation Act. Millennium is conducting subsurface testing and archaeological monitoring as part of planned geotechnical studies in proposed excavation areas. Elements of the project require a permit from the U.S. Army Corps of Engineers, and therefore must comply with Section 106 of the National Historic Preservation Act. Further cultural resources work will be conducted under Section 106 regulations

and guidelines. No adverse impacts are anticipated. The project will comply with all applicable regulations.

14. **Transportation**

a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

The Site can be accessed via 38th Avenue or Industrial Way (SR 432). The existing designated truck route is Industrial Way.

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

The nearest transit stop is approximately 0.7 mile to the north at the intersection of 38th Avenue and Ocean Beach Highway (SR 4).

c. How many parking spaces would the completed project have? How many would the project eliminate?

Existing parking areas will remain and no parking areas will be eliminated as a result of the completed Project.

d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

A traffic study has been generated to determine the potential impacts from car, truck, train, and vessel traffic from the proposed projects (Transpo Group 2010). Any street or other transportation improvements required for the Project are currently being determined based on the results gathered from the traffic study. The number of automobile trips to and from the Site for the 70 full time jobs during the operation of the facility is substantially less than the number of jobs on-site during the operation of the Site as an aluminum smelter by Reynolds. Accordingly, no new roads or streets, or related transportation improvements are anticipated to be required.

e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

Operation of the Site will require both water and rail transportation. Vessels and trains will be loaded and unloaded to facilitate bulk material movement.

Millennium completed a vessel traffic evaluation (BST Associates, 2010) evaluating ship movements and current navigational capacities along the Columbia River. That study included evaluation of the potential impact of the proposed terminal operations and associated ship traffic on existing navigation capacities. The study did not identify any likely adverse impacts associated with the proposed project and vessel traffic.

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

Trips to and from the Site are either associated with material processing operations or employee commute travel. Material processing would generate rail and truck traffic while employee trips would generate only passenger car traffic (Transpo Group 2010).

Material Processing

The proposed activities are anticipated to process an average of 1.2 trains per day, or generate an average of 2.4 unit train trips per day. This is equivalent to a unit train either arriving or departing the Site every 10 hours on average. However, unit trains would arrive at irregular times throughout the day.

Truck trips generated by the project would transport either cement materials or coal. An average of 7.6 truck trips associated with delivering cementitious materials would be generated each weekday. Also, an average of 76.6 truck trips associated with coal deliveries would be generated on weekdays to Weyerhaeuser facilities located near the Site along Industrial Way. Truck trips would be spread throughout each weekday and as a result would generate an average of 10.5 trips during peak commute periods (the time of day for peak volumes has not been estimated).

Employees

Preliminary estimates suggest an increase of up to 20 employees, based on an existing level of approximately 50 employees. Employee shift times and associated arrival times are unknown at this time and, as such, peak period trip generation has not been estimated.

g. Proposed measures to reduce or control transportation impacts, if any:

Millennium has proposed as part of the project to implement a detailed traffic study acceptable to the Washington Department of Transportation, Cowlitz County, and the City of Longview prior to the commencement of upland construction evaluating the potential impacts from car, truck and train traffic from the proposed Porject. That study will identify required on or off-site transportation impacts and mitigation measures necessary to maintain the existing applicable levels of service set for in the Longview and/or Cowlitz County's Comprehensive Plans or other applicable jurisdictional standards. The traffic study shall include specific evaluation of potentially feasible signaling and dispatching system improvements to assist emergency response vehicles in minimizing potential additional delays at road/rail crossings, and shall also include evaluation of potential safety and congestion improvements at road/rail crossings.

15. **Public services**

a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

Actions are underway to connect City of Longview potable water services to the Site. Otherwise, the proposed Project is not anticipated to create an increased need for public services.

b. Proposed measures to reduce or control direct impacts on public services, if any.

The active upland portion of the site is currently contained within fences and has controlled access points. This current level of security will be maintained and, if deemed necessary by Millennium for site security, enhanced. During vessel loading or unloading, Maritime Security (MARSEC) requirements consistent with the Department of Homeland Security's Homeland Security Advisory System will be employed. These MARSEC requirements are in place for current vessel loading or unloading operations and will be maintained when Millennium assumes control of the site.

16. **Utilities**

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other: Internet

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Millennium proposes to supply industrial water for dust suppression, truck washdown, and fire flow from on-site wells and storage. Actions are underway to connect City of Longview potable water services to the Site. All existing utilities serving the Site will continue. Millennium may decide to upgrade telephone and/or internet at some point after operations commence.

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: .....

Date Submitted: .....

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ATTACHMENT A: Project Description

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: (Clyle Hobbs, Project Manager, Millennium Bulk)

Date Submitted: 6 October 2010

transpoGROUP
WHAT TRANSPORTATION CAN BE.

TRANSPO TRAFFIC STUDY ELEMENTS
October 5, 2010

REPORT OUTLINE

- Project Description
- Scope of analysis/Study objectives
- Trip Generation Analysis/Trip Distribution
- Forecast Traffic Volumes
- Intersection LOS analysis
- Analysis of Train Crossing Impacts (vehicle impacts)
- Evaluation of at-grade crossings (detection and control systems)
- Evaluation of Mitigation Measures – including proportionate share calculations of any recommended improvements
- Summary/Conclusions

KEY ELEMENTS

Trip generation analysis. Weekday AM and PM peak hour activity will be summarized by mode reflecting the anticipated increases in employment levels and truck activity. In addition, train activity necessary to service the facility will be estimated and summarized.

Intersection level of service. Intersection levels of service will be calculated at key intersections likely to be impacted by the proposed project. The analysis will be conducted for the weekday PM peak hour, per City/WSDOT requirements. The analysis of intersection LOS will exclude the impacts of a train crossing.

Evaluation of train crossing events. An evaluation of the impacts associated with the train crossing will be conducted at the Oregon Way, Industrial Way, California Way, and 3rd Avenue crossings. The analysis will include an estimation of average and maximum vehicle queuing levels, average vehicle delays, and recovery times for the train crossing events.

Evaluation of existing crossing equipment. *Railroad-Highway Grade Crossing Handbook*, second edition, published by the U.S. Department of Transportation, Federal Highway Administration will be reviewed to determine if any physical and operational improvements can be made to enhance safety and operation of both highway and rail.

EMS Communication Systems. An evaluation of signaling and dispatching system improvements to assist emergency response vehicles in minimizing delays at road/rail crossings will be prepared.

Recommendations. Improvements necessary to mitigate the impacts of the project will be provided. This will highlight any measures possible to minimize or reduce the anticipated queuing levels, or investigate the potential for driver information systems to advise travelers of the crossings.